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nsurance Company

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

BETSY LINDSEY-ESPANIOLA, individually,

Plaintiffs,

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GEICO ADVANTAGE INSURANCE COMPANY; DOE INDIVIDUALS 1-20, inclusive; and ROE CORPORATIONS 1-20, inclusive,

Defendants.

CASE NO.: 2:18-cv-01850-MMD-PAL

STIPULATION AND ORDER TO CONDUCT EXPERT DEPOSITIONS **OUTSIDE THE CLOSE OF DISCOVERY**

IT IS HEREBY STIPULATED by and between Plaintiff, BETSY LINDSEY-ESPANIOLA, by and through her counsel of record, DIMOPOULOS INJURY LAW, and Defendant GEICO ADVANTAGE INSURANCE COMPANY, by and through its counsel of record, ATKIN WINNER & SHERROD, to conduct the depositions of Plaintiff's experts Jason Garber, M.D., and Marc D. Beckerman outside the close of discovery.

This extension will permit the Defendant to take the depositions of Plaintiff's experts ouside the close of discovery because they are not available to be deposed prior to that date, May 28, 2019.

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The depositions of Plaintiff's experts are currently scheduled as follows: 1 2 1. Jason Garber, M.D. - August 8, 2019 2. Marc D. Beckerman - June 11, 2019 3 4 IT IS SO STIPULATED. DATED this <u>aday</u> of May, 2019. 5 DATED this \mathcal{X} day of May, 2019. 6 ATKIN WINNER & SHERROD DIMOPOULOS INJURY LAW 7 8 THOMAS E. WINNER GARNET E. BEAL Nevada Bar No. 5168 Nevada Bar No. 12693 6830 South Rainbow Blvd., Suite 200 LARA L. MILLER Nevada Bar No. 12618 Las Vegas, Nevada 89118 ATKIN WINNER & SHERROD Attorneys for Plaintiff Betsy Lindsey-1117 South Rancho Drive Espaniola Las Vegas, Nevada 89102 Attorneys for GEICO ADVANTAGE INSURANCE COMPANY **ORDER** IT IS HEREBY ORDERED that the depositions of Plaintiff's experts Jason Garber, M.D. and Marc D. Beckerman will be conducted outside the close of discovery. Dated this ²⁸ day of May, 2019. 20 Respectfully submitted by: 21 ATKIN WINNER & SHERROD 22 23 24 Thomas E. Winner Nevada Bar No. 5168 25 Lara L. Miller Nevada Bar No. 12618 26 1117 S. Rancho Dr. 27 Las Vegas, NV 89102 Attorneys for Defendant GEICO Advantage Insurance Co. 28

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